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25 RASIER, LLC; and RASIER-CA, LLC

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF MICHAEL B.
SHORTNACY REGARDING PLAINTIFFS
NOT IN COMPLIANCE WITH THE
COURT'S OCTOBER 23, 2025 ORDER
[ECF 4221]**

This Document Relates to:

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

*Jane Roe CL 178 v. Uber Technologies,
Inc., et al.*, No. 3:25-cv-05537-CRB

1 *Jane Roe CL 179 v. Uber Technologies,*
2 *Inc., et al., No. 3:25-cv-05538-CRB*

3 *Jane Roe CL 181 v. Uber Technologies,*
4 *Inc., et al., No. 3:25-cv-05633-CRB*

5 *Jane Roe CL 182 v. Uber Technologies,*
6 *Inc., et al., No. 3:25-cv-05628-CRB*

7 *Jane Doe NLG (M.E.) v. Uber*
8 *Technologies, Inc., et al., No. 3:25-cv-*
9 *06480-CRB*

DECLARATION OF MICHAEL B. SHORTNACY

I, Michael B. Shortnacy, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Los Angeles, California. I respectfully submit this declaration identifying the Plaintiffs that are not in compliance with the Court's October 23, 2025 Order [ECF 4221].

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC, (collectively, "Defendants"). I am a member in good standing of the Bar of the State of California, the Bar of the State of New York, and the Bar of the District of Columbia. I know the following facts to be true based on my personal knowledge, and if called to testify, I could competently do so.

3. On October 23, 2025, the Court ordered each Plaintiff subject to Uber's Motion to Dismiss Cases for Failure to Comply with PTO 5 to provide a bona fide ride receipt within 14 days of the Order. For those cases where a ride receipt was not readily available, the Court ordered Plaintiffs' counsel to disclose to Defendants within 14 days of the Order: (1) why the receipt is unavailable; (2) the name, phone number, and email address of the accountholder who ordered the ride; (3) the date of the ride, with as much precision as is reasonably possible; (4) the starting location and ending location of the ride, with as much precision as is reasonably possible; (5) any other basic information that may assist Defendants in identifying the ride; and (6) if items (2) through (5) cannot be provided with precision or cannot be provided at all, an explanation as to why the information is not readily ascertainable. The Order therefore compelled compliance by each Plaintiff subject to the Order by November 6, 2025.

4. The Court also ordered counsel for Defendants to submit a declaration within 21 days of the Order (*i.e.*, by November 13, 2025), identifying which, if any, Plaintiffs did not comply with the Court's Order.

5. Counsel for Defendants has reviewed all submissions to MDL Centrality by the Plaintiffs subject to the Court's October 23, 2025 Order to determine whether each Plaintiff has submitted a bona fide ride receipt in compliance with the Court's Order.

6. Based on counsel for Defendants' review of all submissions to MDL Centrality by the Plaintiffs subject to the Court's October 23, 2025 Order, as of November 12, 2025, the Plaintiffs identified in the table attached to this declaration as **Exhibit A** have failed to comply with the Court's Order.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 13, 2025 in Albuquerque, New Mexico.

SHOOK, HARDY & BACON L.L.P.

/s/ Michael B. Shortnacy

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